

# Annex A:

**Sent:** 05 February 2026 12:31

**To:** Democratic Services

**Subject:** Written submission Transport Exec 10/2

Written Statement – Transport Executive Member Session

I spoke at your last Decision Session regarding the Groves statutory parking challenge. I was told officers would engage with the petitioners.

Since the statutory petition was deposited last July, there has been no substantive engagement, beyond several apologies and a single brief email.

Despite the existence of a valid statutory petition, the procedural requirements set out in statutory guidance issued under section 18 of the Traffic Management Act 2004 have not been met, to include but not limited to:

- No Terms of Reference have been agreed with, or discussed with, the petitioners.
- No scope has been defined identifying which Traffic Regulation Orders, charging arrangements, or enforcement practices are under review.
- No engagement has taken place with the lead petitioner or the Groves Association to define the review, as required in the guidance.

Instead, officers have proceeded unilaterally, determining what they consider to be “in scope” and “out of scope”. This approach is not permitted by the statutory guidance.

A statutory parking review is not an internal officer exercise; it must be undertaken with petitioners from the outset.

As a result, the Groves community has been almost entirely excluded from the current consultation activity. As at now, the lead petitioner and the Groves Association remain excluded, and only 8 businesses and 7 institutions have been identified as Groves premises, out of approximately 97 Groves businesses (or around 120 including boundary premises).

Ward councillors were instructed not to share information with the community.

In the absence of a lawful statutory review and meaningful engagement with this (and each) challenger community, the current consultation cannot provide a lawful evidential basis for Member decision-making and cannot remedy the underlying failures.

There are also equality implications. A substantial proportion of Groves businesses, including those operated by people from ethnic minority backgrounds, were excluded without any Equality Impact Assessment at a formative stage.

We therefore ask the Executive Member to note formally that:

1. The Groves statutory parking challenge has not been processed in accordance with statutory guidance.
2. No lawful statutory review is currently in existence.
3. The current consultation exercise cannot cure these defects.

The only lawful course is to pause, reset, and recommence the statutory review process in accordance with statutory requirements, including early engagement with petitioners and agreed Terms of Reference.

Tracy Ostle -Chair Groves Association

Gwen Swinburn Lead petitioner – Groves Statutory Parking Challenge